

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

UNADA (HK) LTD,

Plaintiff,

v.

EC DRIVES, LLC and SPM (UK) LIMITED,

Defendants.

Civil Action No.: 1:18-cv-11638-PBS

JURY TRIAL DEMANDED

**JOINT MOTION TO EXTEND DEADLINES
REGARDING NEUTRAL EXPERT EVALUATION**

On December 26, 2018 the Court granted the parties' Joint Motion prescribing a neutral expert evaluation (ECF No. 38; "Order"). The parties jointly selected a neutral expert pursuant to that Order.

The Order includes several deadlines that the parties chose based on an anticipated January 18, 2019 exchange of samples of the accused products. Due to unforeseen delays in obtaining these samples, the parties jointly and respectfully request that the Court extend the original deadlines by three weeks as follows:

Event	Original Deadline	Proposed New Deadline
Submission of opening briefs to the neutral expert	February 22, 2019	March 15, 2019
Submission of responsive briefs to the neutral expert	March 22, 2019	April 12, 2019
Hearing between the parties and before the neutral expert	On or before April 26, 2019	On or before May 17, 2019
Neutral expert issues report	Within thirty days of the hearing	(No change)

**JOINT MOTION TO EXTEND DEADLINES REGARDING NEUTRAL EXPERT
EVALUATION**

Event	Original Deadline	Proposed New Deadline
Parties' objections to report	Within fourteen days of the issuance of the expert's report	(No change)
Expert's response to objections/issuance of revised report	Within fourteen days of receipt of the parties' objections	(No change)
Parties' Joint Notice to Court	Within fourteen days of the issuance of the expert's report or revised report, whichever is later	(No change)

In response to the Court's margin note in the Order, the parties consent to the use of the neutral expert's report and record of the evaluation proceedings in this litigation if the case does not settle. The parties will designate all such materials as "Confidential" or "Highly Confidential – Outside Attorneys' Eyes Only" pursuant to the Protective Order entered in this case (ECF No. 40) and will not file them with the Court unless under seal pursuant to L.R. 7.2.

Accordingly, the parties jointly and respectfully request that the Court extend the original deadlines for the neutral expert evaluation as set forth above.

Respectfully submitted,

Dated: February 14, 2019

/s/Anderson J. Duff

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*Attorneys for Defendants EC Drives, LLC
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IT IS SO ORDERED,

Dated: _____

The Honorable Patti B. Saris
United States Chief District Judge

CERTIFICATE OF SERVICE PURSUANT TO LOCAL RULE 5.2(B)

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 14, 2019.

/s/Brian M. Gaff

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